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Attorneys for Defendants
COUNTY OF SANTA BARBARA and
SANTA BARBARA COUNTY SHERIFF'S DEPT.

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

JUNAN CHEN, KELLY YAO
WANG, CHANGSHUANG WANG,
JINSHUANG LIU, LICHU CHEN,
and WENQUEI HONG,

Plaintiffs,

v.

COUNTY OF SANTA BARBARA;
SANTA BARBARA COUNTY
SHERIFF'S DEPARTMENT; CAPRI
APARTMENTS AT ISLA VISTA;
ASSET CAMPUS HOUSING; and
DOES 1 through 200, Inclusive

Defendants.

Case No: 2:15-cv-01509-JFW (JEMx)

**NOTICE OF MOTION AND
MOTION FOR JUDGMENT ON
THE PLEADINGS BY
DEFENDANTS COUNTY OF
SANTA BARBARA AND SANTA
BARBARA COUNTY SHERIFF'S
DEPARTMENT; MEMORANDUM
OF POINTS AND AUTHORITIES
IN SUPPORT**

Hearing Date: October 26, 2015
Hearing Time: 1:30 p.m.

Judge: Hon. John F. Walter
Courtroom: 16 – Spring Street Fl.

Trial Date: 04/26/16
FPTC Date: 04/08/16
Discovery Cut-off Date: 02/16/16

TO PLAINTIFFS AND THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE THAT on Monday, October 26, 2015 at 1:30
p.m., or as soon thereafter as the matter may be heard in Courtroom 16 of the

NOTICE OF MOTION AND MOTION FOR JUDGMENT ON THE PLEADINGS

1 above-entitled court, located at 312 N. Spring St., Los Angeles, California,
 2 Defendants COUNTY OF SANTA BARBARA and SANTA BARBARA
 3 COUNTY SHERIFF'S DEPARTMENT ("the County") will and hereby do
 4 move the court to take the following action:

5 1. For judgment on the pleadings pursuant to Federal Rule of Civil
 6 Procedure 12(c) on grounds that Plaintiffs' First Amended Complaint, as against
 7 the moving defendants, shows beyond doubt that Plaintiffs can prove no set of
 8 facts in support of their claims that would entitle them to relief and therefore the
 9 County is entitled to judgment as a matter of law.

10 This motion will be based on this Notice of Motion and Motion, the
 11 accompanying Memorandum of Points and Authorities filed herewith, and the
 12 pleadings and papers on file in this action, and upon such matters as may be
 13 presented to the Court at the time of the hearing.

14 **Compliance with Local Rule 7-3**

15 This motion is made following the conference of counsel pursuant to
 16 Local Rule 7-3, which took place by telephone conference on September 11,
 17 2015. The Local Rule 7-3 conference details are set forth in the Joint Statement
 18 of Counsel Re: Local Rule 7-3 Conference Regarding Santa Barbara County
 19 Defendants' Motion for Judgment on the Pleadings, which was filed on
 20 September 18, 2015.

21 Dated: September 25, 2015 MICHAEL C. GHIZZONI
 22 COUNTY COUNSEL

23 By: /S/ - Mary Pat Barry
 24 Mary Pat Barry
 25 Sr. Deputy County Counsel
 26 Attorneys for Defendants
 27 COUNTY OF SANTA BARBARA and
 28 SANTA BARBARA COUNTY SHERIFF'S
 DEPARTMENT

DECLARATION OF SERVICE

I am a citizen of the United States and a resident of Santa Barbara County. I am over the age of eighteen years and not a party to the within entitled action; my business address is 105 East Anapamu Street, Suite 201, Santa Barbara, CA.

On September 25, 2015, I served a true copy of the within **NOTICE OF MOTION AND MOTION FOR JUDGMENT ON THE PLEADINGS BY DEFENDANTS COUNTY OF SANTA BARBARA AND SANTA BARBARA COUNTY SHERIFF'S DEPARTMENT; MEMORANDUM OF POINTS AND AUTHORITIES IN SUPPORT** on the interested parties in this action by:

☐ by mail. I am familiar with the practice of the Office of Santa Barbara County Counsel for and processing of correspondence for mailing with the United States Postal Service. In accordance with the ordinary course of business, the above mentioned documents would have been deposited with the United States Postal Service, after having been deposited and processed for postage with the County of Santa Barbara Central Mail Room.

☒ electronic transmission via CM/ECF to the persons indicated below:

SEE ATTACHED SERVICE LIST

☒ (Federal) I declare that I am employed in the office of a member of the Bar of this Court at whose direction the service was made.

Executed on September 25, 2015, at Santa Barbara, California.

/s/ - D'Ann Marvin
D'Ann Marvin

SERVICE LIST*Chen, et al. v. County of Santa Barbara, et al.*

United States District Court Central District of California

Case No: 2:15-cv-01509-JFW(JEMx)

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